

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6236 CR-FERGUSON ✓

RELATED CASES  
00-6133-CR-DIMITROULEAS  
00-6227CR-DIMITROULEAS  
00-6235-CR-FERGUSON

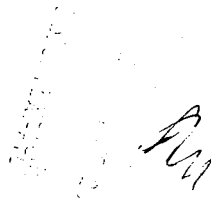
UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS BARRETT STRINGER,

Defendant.



**JOINT MOTION TO CONTINUE PLEA DATE**

Thomas Barrett Stringer ("Stringer"), by counsel and by Assistant United States Attorney Roger Powell ("Powell") hereby jointly request the plea date, set for September 7, 2000, at 9:15 a.m., be reset for the following reasons:

1. On May 4, 2000, Stringer was arrested on a complaint in South Florida, and on four other cases from jurisdictions around the United States.

2. On May 18, 2000, Stringer was arraigned on the Southern District of Florida indictment, 00-6133-CR-DIMITROULEAS.

3. Since the beginning of this case, both undersigned and Powell have worked diligently to consolidate all five cases.



4. One jurisdiction, the Middle District of Florida, agreed to dismiss its complaint if Stringer would agree to the amount alleged for the purposes of “relevant conduct” and restitution. Stringer has so agreed.

5. The other three jurisdictions, The District of Minnesota. The District of South Carolina, and the Western District of Pennsylvania, agreed to transfer their cases, pursuant to F.R.C.P. 20, as long as Stringer agreed to plead guilty and accept the amounts alleged for the purposes of “relevant conduct” and restitution. Stringer has so agreed.

6. The coordination to get the other three jurisdictions to accomplish the transfer has been difficult. *It is almost all done except for the following:*

A. Two of the cases, 00-6235 and 00-6236-CR-FERGUSON, need to be transferred to Judge Dimitrouleas. As of September 6, 2000, Judge Ferguson has not signed the order to transfer the cases to Judge Dimitrouleas.

B. Three of the cases, 00-6235 and 00-6236-CR-FERGUSON and 00-6227-CR-DIMITROULEAS, have not been sent by the Clerk’s office to the Office of the United States Attorney so that they can set up an arraignment on those three cases. Consequently, Stringer has not yet been arraigned on those three cases.

C. The Assistant United States Attorneys on those same three cases have not yet communicated with Powell as to the factual basis for the pleas. Consequently, Powell has not yet prepared a “global” plea agreement for Stringer.

7. Additionally, the discovery material was just received by the undersigned today, September 6, 2000. The material is one foot thick. It needs to be copied and sent to Stringer at the Federal

Detention Center for his review. It is undersigned's experience that Stringer may not receive the material for at least one week from today, or on or about September 13, 2000.

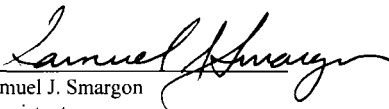
8. It is clearly in Stringer's best interest to consolidate all five of his cases for the purposes of plea and sentence in the Southern District of Florida. Consequently, Stringer specifically waives any and all rights he has under the Speedy Trial Act.

Wherefor, Thomas Barrett Stringer and Assistant United States Attorney Roger Powell, hereby jointly request that his plea date be continued until on or about September 18, 2000, so that all that needs to be accomplished can be completed so that Stringer can confidently plead in all four pending cases.

Respectfully submitted,

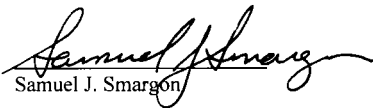
KATHLEEN M. WILLIAMS  
FEDERAL PUBLIC DEFENDER

By:

  
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CERTIFICATE OF SERVICE

I hereby certify that a true a copy of the foregoing instrument was mailed this 6 day of September, 2000 to Roger Powell , Assistant United States Attorney, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301.

  
Samuel J. Smargon